

REMARKS/ARGUMENTS

Applicant wishes to thank the Examiner and Mr. Martin for the courtesies extended in conducting the Telephone Interview with Applicant's representative on November 8, 2005. This Amendment was prepared consistent with the discussions of the Interview.

In this Amendment, Applicant has amended independent claims 1, 6, and 8, and dependent claim 3, to more particularly claim Applicant's invention. In independent claims 1, 6, and 8, Applicant now more particularly claims the location of the abutment portion inside the keys. In the amended claims, the abutment portion is formed inside of the front wall of the keys. As the Examiner will recall in the Interview, Applicant's representative distinguished over Kumano by explaining that Applicant's abutment portion was provided inside the side walls of the keys. In the Office Action, the Examiner has cited to Kumano Figs. 1 and 2 for disclosing an abutment portion inside the side walls of a key. Applicant respectfully submits that any abutment portion shown in Fig. 1 above stopper 52, as argued by the Examiner, does not disclose an abutment portion inside the key side walls. Even in Fig. 2, the cross-sectional structure above stopper 52 does not engage with stopper 52. This cross-sectional structure is associated with white key 20 and does not engage with stopper 52 even though the cross-sectional drawing appears to show engagement. White key 20 engages with stopper 56 and black key 30 engages with stopper 52. See Kumano at col. 3,

lines 57-60 and col. 4, lines 27-31. In the Interview, the Examiner agreed with Applicant's representative.

Therefore, as discussed in the Interview, the only remaining structure in Kumano that the Examiner is arguing discloses an abutment portion inside the side walls is the structure shown in Fig. 2 above stopper 56. As argued by Applicant's representative in the Interview, this structure is not located inside the side walls of the key but rather is the front wall of the key. However, to further distinguish Applicant's invention over Kumano, Applicant has amended independent claims 1, 6, and 8 to more particularly claim that the abutment portion is also formed inside of the front wall of the key. Applicant respectfully submits that this amendment clearly distinguishes Applicant's abutment portion from the front wall 22 of Kumano and obviates the Examiner's rejection of independent claims 1, 6, and 8 based on Kumano. The structure 22 of Kumano cannot both disclose a front wall and an abutment portion formed inside of the front wall. Applicant respectfully submits that the Examiner has cited to no other structure in Kumano that could disclose Applicant's claimed abutment portion located inside the side walls, and front wall, of a key. As such, Applicant respectfully submits that independent claims 1, 6, and 8, and the claims that depend therefrom, are now allowable.

As further discussed in the Interview, and to even more particularly distinguish independent claims 6 and 8 over the cited references, Applicant has further amended claims 6 and 8. Independent claim 6 now further claims that

the plurality of ribs engage with a one of the stoppers. First, as discussed and agreed in the Interview, Applicant respectfully submits that there would be no motivation to include the ribs of Erickson in the structure of Kumano, as argued by the Examiner in the Office Action. Erickson merely discloses a plurality of ribs in a key. They are not associated in any way with an abutment portion and there is no teaching in Erickson to utilize the ribs for abutment or for increasing the surface area of the key for abutment with a stopper. As disclosed in Erickson, the ribs “perform a stiffening function to make the key member 20 relatively rigid.” Col. 3, lines 27-30. Therefore, Applicant respectfully submits that there would be no motivation to modify Kumano with the ribs of Erickson, based on the teaching in Erickson, to disclose an abutment portion formed by a plurality of ribs in Kumano.

However, even if the ribs of Erickson could be included in Kumano, the modified Kumano reference still would not disclose Applicant’s now claimed feature in claim 6 where the plurality of ribs engage with a one of the stoppers. As disclosed at least in Applicant’s specification at page 11, line 26 – page 12, line 30 and drawing figures 5B, 5D, and 5E, the plurality of ribs engage with stopper 6b. Hence, in Applicant’s invention, the plurality of ribs provide a greater surface area for abutment with a stopper. As discussed above, even if Kumano could be modified by Erickson, the modified reference still would not disclose the plurality of ribs engaging with a single stopper. At most, based on

the teaching of Erickson, the ribs of Erickson, if included in Kumano, would merely provide additional stiffening to the key to make the key relatively rigid.

Applicant also respectfully submits that Kumano itself provides no disclosure for this now claimed feature of claim 6. Applicant respectfully submits that even if Kumano could be interpreted to disclose a plurality of ribs, there is no disclosure for the plurality of ribs in a key engaging with a one of the stoppers. Therefore, Applicant respectfully submits that claim 6 is allowable for at least this additional reason.

Independent claim 8, and dependent claim 3, now also more particularly claim the structure for the plate-shaped rib. As amended, the lower surface of the plate-shaped rib, which extends along the plane including the lower end faces of the side walls of the key, includes a largest surface area of the plate-shaped rib. This feature is clearly disclosed at least in Applicant's drawing figure 5F.

In the Interview, in discussing the claimed plate-shaped rib of claim 8, Applicant and the Examiner agreed that the guide piece 55 in Kumano cannot be considered to disclose the "plate-shaped" feature for the rib, as argued in the Office Action. As discussed, if the Examiner is arguing that front face 22 discloses Applicant's claimed "rib", then guide piece 55 cannot be argued to disclose the further claimed feature of the rib where the rib is "plate-shaped". Guide piece 55 is not associated with front face 22, it is not provided on the key,

and it does not abut any stopper. Therefore, as agreed, guide piece 55 cannot disclose Applicant's claimed "plate-shaped" rib.

However, further in the Interview, the Examiner stated that the front face 22 itself of key 20 could possibly be argued to disclose Applicant's claimed "plate-shaped" rib. However, Applicant respectfully submits that even if this front face could in any way be possibly argued to be a plate-shaped rib, it does not disclose the plate-shaped rib as now claimed by Applicant. Now, Applicant claims that the lower surface of the plate-shaped rib, which lower surface extends along a plane including the lower end faces of the side walls, includes a largest surface area of the plate-shaped rib. In Kumano, any lower surface of front face 22 which extends along the plane including the lower end faces of the side walls of the key 20 does not include a largest surface area of the front face. The largest surface area of front face 22 is not included on the lower surface which extends along the plane that includes the lower end faces of the side walls of the key. Rather, this largest surface area is included on the front surface, which extends perpendicularly to the plane that includes the lower end faces of the side walls of the key. Therefore, for this additional reason, Applicant respectfully submits that independent claim 8, and dependent claim 3, are allowable over Kumano.

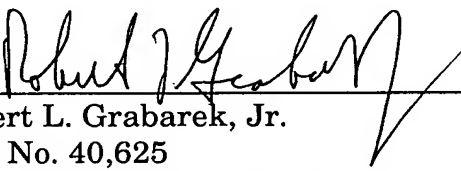
Applicant respectfully submits that the application is now in condition for allowance with claims 1 – 10 being allowable. If there are any questions regarding this Amendment or the application in general, a telephone call to the

undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

As stated above, this paper should be considered as a Petition for an Extension of Time sufficient to effect a timely response. Please charge any such fee or any deficiency in fees, or credit any overpayment of fees, to Deposit Account No. 05-1323 (Docket 056272.52748US).

Respectfully submitted,
CROWELL & MORING LLP

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